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Department of Energy

Richland Operations Office

P.O. Box 550

Richland, Washington 99352

APR 21 1995

Those on Attached List:

OFFER TO MEET TO DISCUSS THE PRELIMINARY DRAFT CONCEPTUAL PLAN FOR THE COLUMBIA RIVER COMPREHENSIVE IMPACT ASSESSMENT

The purpose of this letter is to request a meeting with you, your organization, or your designees to discuss the attached subject plan. In order to obtain maximum consideration of your comments on the proposed subject plan the meeting needs to occur by June 1, 1995. However, the U.S. Department of Energy (DOE), Richland Operations Office (RL), is always willing to discuss the project with you at your convenience throughout the life of the project.

Should you decide to accept this request for a meeting, please indicate whether you would like us to include a representative of RL's contractor who is performing the assessment. Please also indicate if you wish DOE to invite representatives of the U.S. Environmental Protection Agency and the State of Washington (Department of Ecology and Department of Health).

Accordingly, please contact Mr. Randy Brich by May 5, 1995, in order to discuss the necessary logistics for the meeting, at DOE, Richland Operations Office, P.O. Box 550, MSIN H4-83, Richland, Washington, 99352, or at (509) 376-9031.

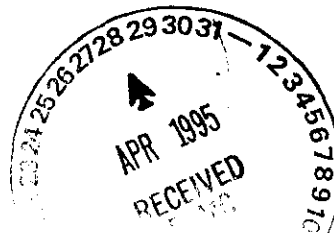
Sincerely,

Julie K. Erickson, Director
River Sites Restoration Division

RSD:RFB

Attachment:
Draft letter to EAP/Ecology
on the PDCP for the CRCIA

cc w/attach:
J. Erickson, DOH
P. Eslinger, PNL
L. Gadbois, EPA
D. Holland, Ecology
J. Yokel, Ecology



APR 21 1995

Addressees - Letter dated

Mr. G. deBruler
Columbia River United
P.O. Box 667
Bingen, Washington 98605

Mr. M. Fox, President
Hanford Family
P.O. Box 1462
Richland, Washington 99352

Mr. R. Gardiner, President
Columbia Gorge Windsurfing Association
614 Sherman Drive
The Dalles, Oregon 97058

Ms. Paige Knight
Hanford Watch
2283 SE Cypress
Portland, Oregon 97214

Mr. R. Patt
State of Oregon
Department of Energy
Water Resources Department
158 12th Street, NE
Salem, Oregon 97301

Mr. G. Pollet
Heart of America Northwest
1305 4th Avenue, 208
Seattle, Washington 98101

Ms. L. Stembridge
HEAL
1408 West Broadway Avenue
Spokane, Washington 99201-1902

ATTACHMENT

D R A F T

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Mr. Steve M. Alexander
Perimeter Areas Section Manager
Nuclear Waste Program
State of Washington
Department of Ecology
1315 W. Fourth Avenue
Kennewick, Washington 99336-6018

Mr. Douglas R. Sherwood
Hanford Project Manager
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, Washington 99352-0539

Dear Messrs. Alexander and Sherwood:

PRELIMINARY DRAFT CONCEPTUAL PLAN (PDCP) FOR THE COLUMBIA RIVER COMPREHENSIVE
IMPACT ASSESSMENT (CRCIA)

- References:
- (1) Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement), Change Control Form, Change Number M-13-93-06 dated January 25, 1994, titled "Cleanup Strategy Documents for the Columbia River and Hanford Groundwater."
 - (2) DOE ltr. to D. C. Nylander and D. R. Sherwood from P. W. Willison "Final Responses to Regulator and Public Comments on DOE/RL 92-28, Columbia River Impact Evaluation Plan, Revision 0 and Transmittal of DOE/RL 92-28, Columbia River Impact Evaluation Plan, Revision 1," dtd. May 6, 1994. *3602*
 - (3) "Special Report Radioactivity in Columbia River Sediments and Their Health Effects," March 1994, by Douglas Wells, Environmental Radiation Program, State of Washington, Department of Health (DOH).
 - (4) "Environmental Radiological Surveillance of Oregon Surface Waters 1961 - 1993," December 1994, by George Toombs, Health Division, Oregon State Department of Energy.

This letter contains the Preliminary Draft Conceptual Plan (PDCP) for the CRCIA that will be implemented in FY 1996 at a planned funding level of \$1M. The PDCP is our proposed approach that will allow the CRCIA to meet the Tri-Party Agreement Milestone M-13-80B (Reference 1). Both the U.S. Environmental Protection Agency (EPA) and the State of Washington, Department of Ecology (Ecology), have expressed the desire that the work on the CRCIA Project be finished by the end of FY 1996. The U.S. Department of Energy is attempting to define a work scope that, if properly executed, will meet Tri-Party Agreement Milestone M-13-80B at the end of FY 1996. This PDCP satisfies the

intent for the assessment as detailed by all parties in the agreed upon scope (Reference 1); and, those tasks that were transferred from the Columbia River Impact Evaluation Plan (Reference 2) to the CRCIA. Specifically, the scope of work to be completed by the CRCIA can be summarized in four categories:

- **Finish Defining Documents** - Finalize the Contaminants of Concern (COC) and Indicator Species documents issued in draft form in FY 1995, write a new scenario definition document, and write a short data summary document.
- **Perform Assessment Calculations** - Risk analyses will be divided into four separate assessments that deal either with specific contaminants or specific geographic regions. The results of each assessment will be published in a brief stand-alone report.
- **Conduct Tribal and Public Interactions** - Both presentations and interaction meetings will be scheduled with the Native American Tribes, Hanford Advisory Board (HAB), interested groups, and the general public to discuss progress and gather comments and concerns. Formal nation-to-nation consultations with the tribes will be arranged as needed.
- **Write the Final Report** - A year-end report will be written to summarize the results of the individual assessments. The final report will provide the discrete deliverable needed to meet Tri-Party Agreement Milestone M-13-80B. This report is considered a secondary document under the Tri-Party Agreement protocols.

Finish Defining Documents - The following documents will provide the foundation for the remaining work. These documents include:

- COCs: Utilize the final report that will be written in FY 1995 defining the COCs for the project. Only those contaminants defined in this document will be subjected to further analysis.
- Indicator Species: Finalize the draft report written in FY 1995 defining the indicator species for the project. Only those species identified in this document will be subjected to detailed analysis.
- Analysis Scenarios: Develop, publish, and revise based on comments received a report identifying the scenarios (exposure pathways, lifestyle parameters, ecological and human interactions, etc.) that need to be analyzed in the assessments in order to answer questions posed by EPA, Ecology, Indian Nations, stakeholders, and public.
- Data Report: Publish a short report on the data to be used in the analyses. The intent is not to publish all of the sampling numbers but to indicate when and where sampling has been conducted since 1980 for the contaminants of highest concern.

Perform Risk Assessments: The draft COC report identifies approximately 30 contaminants that merit a more extensive analysis relative to their risk potential for humans or the ecological system. The COC will be revised to address all comments received from the regulators, Tribal Governments and public. DOE-RL proposes to perform human and ecological risk analyses in a series of assessments on these contaminants. Available data on synergistic effects between contaminants will be collected while performing the individual assessments. The assessments will be published in a series of short reports for regulatory, tribal, and public review.

Four assessments are proposed. The first two assessments deal with specific contaminants. The second two assessments deal with all the remaining contaminants on a geographic basis. The proposed assessments are:

- Assessment #1: Fallout or Background Materials - The concentrations measured for a number of contaminants in select media may be due to global fallout, natural sources or are near typical background levels. The data for each contaminant will be examined to determine if the source of values above background levels is from Hanford-related activities. If Hanford is not identified as a primary contributor to the source of the contamination, these materials will be eliminated without computing any risk estimates.
- Assessment #2: Hot Particles and External Radiation - Historical measurements have shown the presence of small particles containing ⁶⁰Co in the sediment of the Columbia River. These particles likely are still present in measurable quantities on D Island and other places. Some areas along the Hanford Reach have an elevated external gamma ray exposure rate due to "skyshine" from nearshore facilities and outfalls. The gamma ray exposure rate along the entire Hanford Reach is slightly elevated, and there is some external exposure from deposited contamination. This assessment will examine the risk from discrete particles and external dose. Relevant information contained in the recent DOH report on sediments (Reference 3) and any future reports from DOH will be used to avoid duplication of effort and to reduce CRCIA Project costs.
- Assessment #3: McNary Pool and Downriver - Human and ecological risks will be evaluated for contaminants in the sediments and water column in McNary Pool and further downstream in the Columbia River. This assessment will deal with the contaminants not addressed in the first two assessments. To avoid duplication of effort and to efficiently and effectively address any remaining outstanding issues, all relevant information and conclusions embraced in the recent DOH report on sediments (Reference 3) and the State of Oregon, Department of Energy, report on Columbia River water quality (Reference 4) will be utilized in completing this assessment.

Messrs. Alexander and Sherwood

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- Assessment #4: Hanford Reach - Human and ecological risks will be evaluated for the seeps and springs, riparian zone, mixing zones, sediments and outfall pipes, and water column in the Hanford Reach of the Columbia River for the contaminants not addressed in the first two assessments. This assessment will include an assessment of the data obtained during the recent salmon redd/chromium (VI) study and outfall pipe characterization being performed by Bechtel Hanford, Inc.
- Final Report - A final report will be prepared summarizing the results of the individual assessments. This final report is expected to be short, referencing the published assessments rather than restating them. The purpose of the final report is to meet Tri-Party Agreement Milestone M-13-80B.

Tribal and Public Involvement Support: The CRCIA Project has been the subject of significant number of comments from the Native American Tribes, HAB members, interest groups, and the general public. Specific activities to be conducted related to public involvement include:

- Tribal and Public Involvement Plan - Update the CRCIA Project Public Involvement Plan (April 1994) to specifically reference items identified in this scope of work.
- Tribal and Public Interactions - Plan, schedule, and support meetings on the assessments. Interactions are anticipated to occur with the three Native American Tribes, the HAB, other stakeholders, and the general public.

Schedule Considerations: A tentative schedule contains five meetings for the regulators, Native American Tribes, and the public. This tentative schedule has not received DOE Richland Operations Office, Office of External Affairs (OEA), review. It is understood that some of the stakeholders have indicated that Tri-Party Agreement-related public involvement activities need to be better coordinated. The following schedule and proposed content for the meetings is the CRCIA Project's best estimate and is subject to approval from OEA:

- **October 1995:** Meeting topics would include the final COC report, draft Indicator Species report, draft Scenario report and analysis concepts for assessments 1 and 2.
- **January 1996:** Meeting topics would include draft results for assessments 1 and 2 and analysis concepts for assessments 3 and 4.
- **April 1996:** Meeting topics would include final results for assessments 1 and 2 and draft results for assessment 3.
- **July 1996:** Meeting topics would include final results for assessment 3 and draft results for assessment 4.

Messrs. Alexander and Sherwood

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- **September 1996:** The meeting topic would be the final assessment.

This letter conveys a preliminary concept for the work scope that has not been confirmed by detailed planning from our contractor. Implicit in this work scope are several assumptions. Failure to meet any one of the assumptions could seriously jeopardize the success in meeting the desired project completion date. Additionally, assuming the peer reviewers are in place and functioning by June 14, 1995, they will be given the opportunity to review and comment on this PDCP.

If you want to discuss this matter further or require additional information, please contact Mr. Randy Brich by May 15, 1995, at 376-9031.

Sincerely,

RSD:RFB

Julie K. Erickson, Director
River Sites Restoration Division

Attachments: As stated

cc w/attachs:

L. Gadbois, EPA
D. Holland, Ecology
R. Jim, YIN
R. Patt, Oregon DOE
D. Powaukee, NPT
J. Wilkinson, CTUIR
J. Yokel, Ecology